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17 *Attorneys for Defendant LG Electronics, Inc.*

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

20 In re: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

Case No. Master File No. 3:07-md-05944-SC
MDL No. 1917

22 This Document Relates to:

23 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
24 No. 11-cv-05513

25 *Best Buy Co., et al. v. Technicolor SA, et al.,*
26 No. 13-cv-05264

27 *Sears, Roebuck and Co. and Kmart Corp. v.*
Technicolor SA, No. 3:13-cv-05262

28 *Sears, Roebuck and Co. and Kmart Corp. v.*

**DECLARATION OF E. MARTIN
ESTRADA IN SUPPORT OF
DEFENDANTS' MOTION *IN LIMINE*
#16: TO PERMIT EVIDENCE AND
ARGUMENT REGARDING UPSTREAM
PASS-ON AND PLAINTIFFS'
BARGAINING POWER**

Judge: Hon. Samuel Conti
Date: None Set
Ctmm: 1, 17th Floor

3:07-cv-05944-SC; MDL 1917

1 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
2 05514

3 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*
4 *et al.*, No. 13-cv-1173

5 *Sharp Electronics Corp., et al. v. Koninklijke*
6 *Philips Elecs., N.V., et al.*, No. 13-cv-2776

7 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502

8 *Siegel v. Technicolor SA*, No. 13-cv-05261

9 *Target Corp. v. Chunghwa Picture Tubes,*
10 *Ltd.*, No. 11-cv-05514

11 *Target Corp. v. Technicolor SA*, No. 13-cv-
12 05686

13 *ViewSonic Corporation v. Chunghwa Picture*
14 *Tubes Ltd.*, No. 14-cv-2510

Declaration of E. Martin Estrada

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2 1. I am an attorney licensed to practice law in the State of California. I am an attorney
3 in the law firm of Munger, Tolles & Olson LLP, counsel of record for defendant LG Electronics,
4 Inc. ("LGE") in the above-captioned actions. I submit this declaration in support of Defendants'
5 Motion *in Limine* #16 to Permit Evidence and Argument Regarding Upstream Pass-On and
6 Plaintiffs' Bargaining Power.

7 2. Attached hereto as Exhibit A is a true and correct copy of an excerpt from the
8 expert report of Dr. Alan Frankel, dated April 15, 2014, and served in *Best Buy Co., Inc., et al. v.*
9 *Hitachi, Ltd., et al.*, No. 11-cv-05513 and *Best Buy Co., et al. v. Technicolor SA, et al.*, No. 13-cv-
10 05264.

11 3. Attached hereto as Exhibit B are true and correct copies of excerpts from the
12 transcript of the July 10, 2014, deposition of Dr. Alan Frankel.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th
14 day of February 2015, in Los Angeles, California.

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16 By: /s/ E. Martin Estrada
17 E. Martin Estrada
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